

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRITTANI DANETTE ATKINS,)
Plaintiff,)
)
v.)
)
HEALTHCARE REVENUE RECOVERY GROUP, L.L.C.,)
Defendant.)

**PLAINTIFF'S MOTION TO COMPEL
DEFENDANT'S PRODUCTION OF DISCOVERY**

Plaintiff Britani Atkins, by her counsel Paúl Camarena, respectfully moves this Honorable Court to order the Defendant to respond to Ms. Atkins' requests for discovery. Ms. Atkins, in support of her motion, states as follows:

In this Fair Debt Collection Practices Act case, Ms. Atkins asserts that the Defendant continued to call her and hung-up on her even after she advised the Defendant that she would not communicate with the Defendant. Thus, Ms. Atkins reasonably requested the Defendant to produce records of its communications with Ms. Atkins. However, the Defendant refuses and asserts that Ms. Atkins' request is "overbroad," "unduly burdensome," "not proportional to the needs of the case," and "seeks information that is confidential."

Also, because the FDCPA regulates only parties that meet the statutory definition of a "debt collector," Ms. Atkins served an interrogatory inquiring whether the Defendant regularly attempts to collect debts asserted to be owed another. However, the Defendant again refuses to respond and asserts that Ms. Atkins' interrogatory seeks information that "is irrelevant to Plaintiff's claims, seeks information that is not proportional to the needs of the case and is overbroad and vague" and "calls for a legal conclusion."

Without the Defendant's cooperation with this judicial process, the Defendant would be free to violate the law and Ms. Atkins would not have recourse to the courts because she would not be able to establish at least one element of her claim. Thus, Ms. Atkins requests the Court to order the Defendant to answer Ms. Atkins' requests for discovery or to hold that the Defendant has conceded these issues.

Pursuant to Local Rule 37.2, Ms. Atkins' attorney Paúl Camarena, certifies that, on Wednesday September 8, 2021 at 2:19pm CST, he consulted telephonically with the Defendant's attorney Krista Eamon and, in good faith, he attempted to resolve the parties' differences, but he has not been able to do so.

Respectfully submitted,
Plaintiff's, Britani Atkins's, Counsel
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